

## FIELD CHANGE REQUEST (FCR) FORM

Project Name: Arkema Project Area – PDI Phase 1

Project No.: CF167

Client: LSS/Retia USA

Request No.: FCR-09

To: Madi Novak, EPA

Date: November 22, 2021

Field Change Request Title: PPE and COVID-19 Requirements

### Description:

Riverbank soil sampling was conducted in the Arkema Project Area in July 2021. Site-specific health and safety plan Addendum 1 (Addendum 1) included respirator use to protect workers from potential asbestos fibers in riverbank soil on Lots 1 and 2 until sufficient air monitoring was conducted. The personal and area air monitoring was conducted during the riverbank soil sampling on Lots 1 and 2 where asbestos could be present. The monitoring was conducted for three shifts. The fibers per cubic centimeter were below the U.S. Environmental Protection Agency criteria and the Oregon OSHA permissible exposure limit for all personal and area air monitoring samples. This represents a conservative case because this is near potential historical source areas of asbestos and the moisture content of the soils is less than sediment (even with wetting the soils). The wet nature of the sediments would limit the distribution of any asbestos fibers in air, if present.

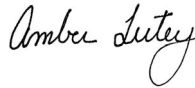
There are no overhead hazards in the core processing facility, so hard hats are not necessary. Sediment processing activities will be conducted carefully to avoid splashing of decontamination water or sediment, so chemical protective footwear and coveralls are not necessary. In addition, chemical protective footwear can also create slipping hazards for the vessel and core processing crews. The Contaminant Reduction Zone will have a boot wash station if needed in accordance with the site HASP to address potential tracking of the sediment.

As noted in Addendum 1, Oregon OSHA removed the face covering and distancing requirements from the COVID-19 rule on June 30, 2021. However, new indoor masking requirements were announced on August 11, 2021 to address the Delta variant. Wearing face coverings and 6 ft physical distancing are optional for vessel operations and core processing with the roll-up garage door next to the core processing table open, but are required in the core processing area if the roll-up garage door is closed.

### Recommended Change:

No asbestos fibers are expected from the sediment since it will be saturated, so no air monitoring for particulates will be conducted. Breathing zone air will be monitored with a PID for organic vapors in the sediment processing area in accordance with the site HASP. Hard hats will only be donned if an overhead hazard is present. Chemical protective footwear and coveralls will not be required. Face coverings and 6 ft physical distancing are optional for vessel operations and core processing with the roll-up garage door next to the core processing table open, but are required in the core processing area if the roll-up garage door is closed.

Amber Lutey  
Field Operations Lead (or designee)

  
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Signature

November 19, 2021  
\_\_\_\_\_  
Date

Approval:

Eron Dodak  
Project Manager

  
\_\_\_\_\_  
Signature

November 22, 2021  
\_\_\_\_\_  
Date

Madi Novak  
EPA Remedial Project Manager

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Signature

\_\_\_\_\_  
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